

## AFFIDAVIT OF BERTHA HARPER

My name is Bertha Harper. I am an adult resident of Macon, Mississippi and I state the following based upon my own personal knowledge and am competent to testify to such matters. I have been made aware that a statement with my signature was sent to Waide and Associates, the law firm representing Kendrick Slaughter in a legal matter.

I have been told that the statement contains a complaint that I supposedly made to the Noxubee County Sheriff's Department against Kendrick Slaughter. However, the statement described to me by Attorney Kimla Johnson is false and inaccurate and was composed by Patsy Boykin Roby and Sheriff's Deputy Terry Grasserree. The things in the statement never happened. I didn't know the contents of the document until Ms. Johnson told me about them. I cannot read or write and the statement was not read to me when I signed it.

My signature was obtained under false pretenses. Some time last year, Mabel Phillips and I were walking down the street when Patsy Boykin Roby pulled her car up to us and told us that she was taking us to the jailhouse to sign some papers and that we would get paid for it. She took us to the jailhouse and talked to Deputy Grasserree. He then wrote two statements, one for Mabel and one for me to sign. Patsy also signed them both. Neither Patsy nor Grasserree told us what the statement said. Neither Patsy nor Grasserree read the statements to us. We never got paid for the statements.

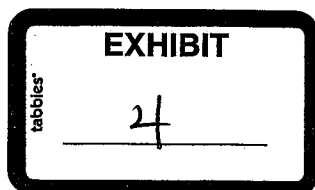
I did not and do not have any complaint against Kendrick Slaughter and feel I was tricked by Patsy Boykin Roby and Terry Grasserree so they could make up lies about Kendrick Slaughter.

This statement having been read to me, I declare under penalty of perjury the above and foregoing is true and correct.

Further affiant saith not.

Executed this 4<sup>th</sup> day of December, 2006.

1  
BERTHA HARPER  
Lavin Robinson



281-1234  
Bertha Harper

11/10/65

4:47 PM

DOB 12-18-54

161 MAULB. AP.

MACON MS 39341.

662-726-5822

Age / 40T-31-9956

During voting time in may I don't know the date but in the year of 5005. Shawn Slaughter came to my house. he came to the door. He said do you want to vote. I said NO. He said he knew where Jim was (Jim was my boy friend he had moved to Lauderdale.) He told me to get into his truck (He was driving the green he always drives.) When he got me into the truck he took me to the pole voting. Shawn said he would pay me to vote for him I don't remember how much money. But I never got anything. When he took me home he said if go back and vote again he said he was going to lock me up. (Philip Brown was with Shawn. (Mable Phillips was with me he said the same thing to mable (Daisy Larkin Roby) I had told her what happen. I was scare. She took me to Percy Freshour with Macon Police Dept. Percy told me + pesty and mable that Shawn couldn't do this so I voted the way I wanted to. When Shawn saw me at the pole he just looked at me and rolled his eyes. I could tell he

he was mad.

Shawn was loaning me money a dollar on a dollar. This happen before the election and after the election I would borrow 40.00 or 50.00 from Shawn. He would come to me and tell me I owe him <sup>\$</sup>100.00 on <sup>\$</sup>40.00 sometime he would tell me I owed him <sup>\$</sup>200.00 + something I quit dealing with Shawn because he was beating me <sup>out my money</sup>. He would tell me he would stop the mother fucking Hell out of me so I quit messing with him because of the threat.

Hee

X Bertha + Harper  
MARK

Patsy Kelly  
JMK

AFFIDAVIT OF MABEL PHILLIPS

My name is Mabel Phillips. I am an adult resident of Macon, Mississippi and I state the following based upon my own personal knowledge and am competent to testify to such matters.

I have been made aware that a statement with my signature was sent to Waide and Associates, the law firm representing Kendrick Slaughter in a legal matter. I have been told that the statement contains a complaint that I supposedly made to the Noxubee County Sheriff's Department against Kendrick Slaughter. However, the statement described to me by Attorney Kimla Johnson is false and inaccurate and was composed by Patsy Boykin Roby and Sheriff's Deputy Terry Grasserree. The things in the statement never happened. I didn't know anything about the contents until Ms. Johnson told me about them. I cannot read or write well and the statement was not read to me.

My signature was obtained under false pretenses. Some time last year, Bertha Harper and I were walking down the street when Patsy Boykin Roby pulled her car up to us and told us that she was taking us to the jailhouse to sign some papers and that we would get paid for it. She took us to the jailhouse and talked to Deputy Grasserree. He then wrote two statements, one for Bertha and one for me to sign. Patsy signed them both. Neither Patsy nor Grasserree told us what the statement said. Neither Patsy nor Deputy Grasserree read statement to us. We never got paid for the statements.

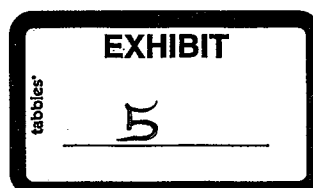
I did not and do not have any complaint against Kendrick Slaughter and feel I was tricked by Patsy Boykin Roby and Terry Grasserree so they could make up lies about Kendrick Slaughter.

This statement having been read to me, I declare under penalty of perjury the above and foregoing is true and correct.

Further affiant saith not.

Executed this 4 day of December, 2006.

Mable Phillips  
MABEL PHILLIPS



Mable Phillips

10/10/05

DOB 11-26-65

5:08 PM

Age 33

105 OAK ST

Macon MS 39344

During the election when Shawn Stashiter was running for office. He came to my house and told me if I vote for him he would pay me. So he put me in his truck and took me to the voting pole @ City Hall. I went inside and voted for Shawn. When I came outside he took me home. He didn't say anything else about the money. But he did tell me that if I go back to the pole to vote for anyone else he would come back and put me in jail beat me up. He got mad when he saw me back at the pole. I went to the pole with Pasty. Because my sister and Bertha had told Pasty what happen. She took us to Perry Freshour with Macon police. He had told us that Shawn could not do this. So we voted the way we wanted to.

X MABLE PHILLIPS  
~~Shawn~~  
Pasty Kelly

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION

KENDRICK SLAUGHTER, )  
 )  
Plaintiff, )  
 )  
VERSUS ) CIVIL ACTION NO.: 4:05CV162L-R  
 )  
COUNTY OF NOXUBEE, MS, ET AL, )  
 )  
Defendants. )

AFFIDAVIT OF RALFEAL JAMES BROWN

NOW comes the affiant, Ralfeal James Brown, an adult resident citizen of Noxubee County, Mississippi, who is over the age of eighteen and who is competent to testify to these matters, states as follows:

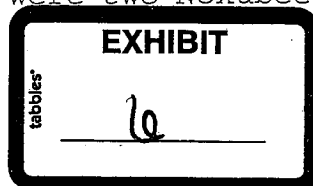
1. In or about May 2002, I was arrested and incarcerated in Noxubee County jail.

2. Chief Deputy Grasserree came to the jail and took me to the courthouse for a bond hearing.

3. Once at the courthouse, I asked Chief Grasserree if I could speak with my mother, who was in the courtroom. He called her back to where he had me in the jury room and allowed me to talk with my mother.

4. My mother began to cry and I asked her what was wrong. She didn't answer and I walked toward her asking what was wrong.

5. Chief Grasserree grabbed me by my arm and put handcuffs on me, saying, "You might escape." He took me into another room and closed the door. There were two Noxubee County police officers



11

and a state trooper in the room at the time. They just watched what happened.

6. Chief Deputy Grasserree said, "I don't like the way you talked to your mother," and I told him that he had nothing to do with how I talk to my family. He punched me in my chest.

7. He started flexing his muscles and bragging that he was the "Big Dog," the "Great One," and the "Rock." he got up in my face and leaned into me yelling at me. I tried to yell back and the commotion cause alarmed my sister, and she opened the door to see what was happening.

8. One of the officers who was watching closed the door in my sister's face. Chief Grasserree began to punch me with his fists in my head and chest. He knocked me back and over and, still in handcuffs, I fell onto a table.

9. By that time, my sister had run into a courtroom and gotten a judge, Dirk Dicks on, off of the bench to come in to stop Deputy Chief Grasserree from hitting me.

10. Judge Dicks on grabbed Chief Deputy Grasserree and pulled him off me. Deputy Chief Grasserree kept yelling at me even though the judge told him to stop.

11. He started yelling that he would add charges to me for assaulting *him*.

12. The judge took me into the courtroom and lowered my bond so that my family could get me away from Chief Deputy Grasserree, but chief Deputy Grasserree added three or four additional charges

to me and he had to raise it again. The bond was then too high and I had to stay in jail for about forty days.

13. When I was returned to the jail that afternoon, Chief Deputy Grasserree told the officers who were escorting me to put me in his office because he needed to talk to me. They took off my handcuffs and put me in his office with him and closed the door.

14. Chief Deputy Grasserree told me that if I sued him for beating me, he would make sure I went to the penitentiary. He said, "OR . . . I can get all of your charges dropped if you don't." I did not respond. He told me to go on to the back of the jail where I was placed in a cell.

15. About forty days later, I was taken before Judge Dicks on and all of the charges against me were dropped.

16. In December 2004, I was again incarcerated in the Noxubee County jail. I was in a cell with about eight or nine other men. A cement block that had been loosened by a previous inmate got knocked out of the wall in the day room. When the men in the cell were questioned by Chief Deputy Grasserree, he threatened to punish everyone for it, so I told him I did it by accident. He said, "Don't worry about it, we'll get it fixed."

17. About a week later, more cement blocks got knocked out of the wall in the day room. The wall that they came out of was not adjacent to my cell area or even near my cell area. Chief Deputy Grasserree and Officer Kendrick Slaughter came to the door of the cell. Chief Deputy Grasserree, without questioning anyone, called



me out into the hall.

18. When I stepped into the hall, Chief Deputy Grasserree stepped into the cell and went over to my television. He picked it up and said, "they gon' tear up my mo\_\_r fu-kin' jail and have the sheriff all over me?!" He kicked the television across the room, breaking it beyond repair.

19. When I saw the television flying across the room, I stepped into the cell to look. Chief Deputy Grasserree told me to step back out into the hall. I did and he put my hands behind my back and handcuffed me that way.

20. He said, "You not gon' tear up my jail," and I said, "I didn't knock those blocks out of the wall. I didn't even knock out the first one."

21. Chief Deputy Grasserree grabbed me around my neck and choked me. I began to foam at the mouth and lose consciousness. Officer Slaughter was yelling and trying to get Chief Deputy Grasserree to let me go. Officer Slaughter yelled that Grasserree was suffocating me and that I was foaming at the mouth. I passed out.

22. When I awoke, I was laid out on the floor, still handcuffed, and Chief Deputy Grasserree had his knee in my back. It was just like he had his knee in the back of the man in the newspaper article. He was yelling, "You did it, mo--er f--er , you did it!" He told me to stay on the floor and I did. Officer Slaughter was still there, but I could not see him.

23. Chief Deputy Grasserree got up, went and got another inmate, Montrel Moseley, and took him outside, handcuffed behind his back. After a while, he brought him back in and put him in the cell across from where we were housed. Later, back in the cell, Moseley told me that Grasserree had beat him in his ribs with his fists while yelling that he [Moseley] had torn up his jail. I was still on the floor, handcuffed.

24. Chief Deputy Grasserree went back into the cell and pulled another inmate, Anthony Brooks, out into the hall and handcuffed him behind his back. He threw Brooks onto the floor beside me and started kicking him and punching him while yelling, "You tore up my jail, mo-er fu-er!" Anthony was balled up from the pain and he yelled back, "I'm sorry, Big Dog! I won't do it again!" Chief Deputy Grasserree stopped beating Brooks and took the handcuffs off of both of us. He put us in another cell together where we stayed three days until the cell was repaired.


25. When we were returned to our cell, I asked a trustee to use the phone. The trustee said that Chief Deputy Grasserree had turned the phones off. The phones stayed off for a week. I wrote my mother and stated in the letter that I wanted to sue Chief Deputy Grasserree. I gave the mail to a trustee, which is normal procedure. The next morning, Chief Deputy Grasserree came to the cell and said, "Sue me! You ain't gonna get but two thousand dollars. It ain't my money, it's the County's money. I don't care."

26. I served the remainder of my time without incident and was released on July 7, 2006. I not seen Chief Deputy Grasserree since these May 3, 2005.

I declare under penalty of perjury the above and foregoing is true and correct to the best of my knowledge.

Further affiant saith not.

EXECUTED, this the 17 day of July, 2006.

  
\_\_\_\_\_  
Rafeal J. Brown

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION

KENDRICK SLAUGHTER,

Plaintiff,

VERSUS

COUNTY OF NOXUBEE, MS, ET AL,

Defendants.

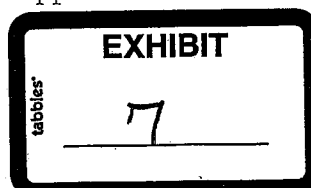
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) CIVIL ACTION NO.: 4:05CV162-L-R  
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**AFFIDAVIT OF BYRON D. GREEN**

My name is Byron D. Green. I am an adult resident citizen of Mississippi. I state the following based upon my own personal knowledge and am competent to testify to such matters.

I was being held in jail because, I was told, Lee County had a warrant for me. There was no air conditioner, no water, no lights, and only one working toilet due to the sewage backing up in my cell. I lived in a foot and a half of sewage water, without washing, in ninety-degree heat, and without any lights (or daylight from a window) for eight to ten days. The inmates were given mops to soak up the sewage, but it was running constantly, so the mops were ineffectual. After eight or ten days, I could not stand it any longer. I asked to be put into another cell and refused to go back into that cell.

Deputy Sheriff Grasseree and Officer John Clanton came into the cell. They cleared my cell of all other inmates. Officer Clanton grabbed my right arm and twisted it. Deputy Sheriff Grasseree put a nightstick around my neck and carried me down the hall by my neck and put me in the cell. Deputy Sheriff Grasseree was cursing and taunting me the whole time, with comments like, "This is my jail! You gon' do what the f\_ck I say do, or I'll shoot you in the head! I'm the Big Dog! I'm Number One! This my jail!" Then Deputy Sheriff Grasseree left and came back. Officer Clanton cuffed me behind my back and brought me out into the hall. Deputy Sheriff Grasseree put a choke hold on me until I passed out. Deputy Sheriff Grasseree dropped me on the floor and then he and Officer Clanton



dragged me into a cell. As a result of this assault, Deputy Sheriff Grasseree charged me with five charges: insinuating a riot, disorderly conduct, assault on a police officer, disturbing the peace, and threatening an officer. There are witnesses to what happened to me.


Later, when Officer Slaughter was brought into the jail, I observed how he was being treated. Deputy Sheriff Grasseree grabbed Officer Slaughter with a headlock choke hold and made him walk down the hall that way. Deputy Sheriff Grasseree was cursing Officer Slaughter and told him, "I told you I would get you!" I saw Deputy Sheriff Grasseree get up into Officer Slaughter's face, spitting and cursing, pushing him and mocking him. I saw Deputy Sheriff Grasseree "roughing up" Officer Slaughter.

Later, I was brought into Deputy Sheriff Grasseree's office. Deputy Sheriff Grasseree put his feet up on the desk with his hands behind his head and smiled. He laughed and told me about what had just happened with Officer Slaughter. Deputy Sheriff Grasseree stated to me that Sheriff Walker had told him that he wanted Officer Slaughter fired and that he wanted Deputy Sheriff Grasseree to get it done. He said that Sheriff Walker had instructed him to "get Officer Slaughter's badge" and that he had gone after Officer Slaughter because he had to do as the Sheriff told him. Deputy Sheriff Grasseree also said that he had rammed the back of Officer Slaughter's car when Officer Slaughter would not do what he said and had instead had gone on a high-speed chase to the courthouse.

I declare under penalty of perjury the above and foregoing is true and correct.

Further affiant saith not.

EXECUTED, this the 29 day of SEPT, 2006.

  
BYRON GREEN

# ORIGINAL TRANSCRIPT

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION

KENDRICK SLAUGHTER

PLAINTIFF

VERSUS

CAUSE NO. 4:05CV162TSL-AGN

COUNTY OF NOXUBEE, MISSISSIPPI, RODERICK D.  
WALKER, IN HIS OFFICIAL CAPACITY AS NOXUBEE  
COUNTY ATTORNEY, TERRY GRASSAREE, IN HIS  
OFFICIAL CAPACITY AS A NOXUBEE COUNTY  
SHERIFF'S DEPUTY AND IN HIS INDIVIDUAL  
CAPACITY, ALBERT WALKER, IN HIS OFFICIAL  
CAPACITY AS SHERIFF OF NOXUBEE COUNTY AND  
IN HIS INDIVIDUAL CAPACITY

DEFENDANTS

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## *DEPOSITION OF TERRY GRASSAREE*

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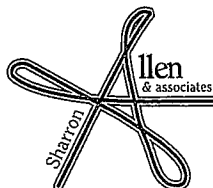
### *APPEARANCES:*

*KIMLA C. JOHNSON, ESQUIRE*  
Waide & Associates  
332 North Spring  
Tupelo, Mississippi 38804

### *REPRESENTING THE PLAINTIFF*

*MICHELLE L. TOLLE, ESQUIRE*  
Page Kruger & Holland  
10 Canebrake Boulevard, Suite 200  
Jackson, Mississippi 39232

### *REPRESENTING NOXUBEE COUNTY & RODERICK WALKER*



(601) 825-6339 Fax (601) 825-1154  
P. O. Box 1731, Jackson, MS 39215  
[www.sharronallen.com](http://www.sharronallen.com)

**EXHIBIT**

**8**

1 Q. will you run again?

2 MR. WILSON: Object to the form.

3 A. I don't know right now.

4 BY MS. JOHNSON:

5 Q. what about for sheriff?

6 A. I don't know right now.

7 Q. Were you on a Democratic committee with Ike  
8 Brown?

9 A. At one time, yes, ma'am.

10 Q. And did you work closely with him?

11 MR. WILSON: Object to the form.

12 A. No, ma'am.

13 BY MS. JOHNSON:

14 Q. Okay. Did you work with him at all? I should  
15 ask. I'm sorry.

16 A. They had, like, one or two meetings. That's  
17 all I remember.

18 Q. Okay. And you said you don't work with him  
19 now?

20 A. No, ma'am, never worked with him. He was --  
21 could have been the chairman of something and I was  
22 just on the board. I went to one or two meetings.  
23 That was it. We don't really converse.

24 Q. Okay. Do you recall seeing Mr. Slaughter  
25 downtown on Washington Street recently, while you were

STATE OF MISSISSIPPI, NOXUBEE COUNTY

BEFORE ME,

Terry M. Lessard

Justice Court Clerk of

Noxubee County,

Terry M. Lessard

makes affidavit

that Kentrick Shaw Slaughter on or about the 15th day of July

2005, in the county aforesaid did willfully and unlawfully with intent to provoke a breach

of peace refuse to comply with the command of Chief

Deputy Terry M. Lessard a law enforcement officer

who had the authority to then and there arrest any person

for a violation of the law. (would not stop his veh.

when told to while driving off and riding down the Hwy.)

Disorderly Conduct - failure to comply w/request or command

of law enforcement officer 97-35-7 (1)

against the peace and dignity of the State of Mississippi.

Sworn to and subscribed before me this

26th day of July

, A. D., 2005.

Lynn A. Moore

Terry M. Lessard

Justice Court Clerk

EXHIBIT

9



STATE OF MISSISSIPPI, NOXUBEE COUNTY

BEFORE ME,

Betty Ch... Justice Court Clerk of

Noxubee County, Chief Deputy Terry M. Cross makes affidavit

that Kendrick S. Stoughter on or about the 15 day of July

2005 in the county aforesaid did willfully and unlawfully Cause a disturbance at  
magnolia DC Hwy. by yelling and not doing what  
he was told to do. would not quit yelling

Disorderly Conduct - Breach of Peace

97-35-3 (1)(b)

against the peace and dignity of the State of Mississippi.

Sworn to and subscribed before me this 26<sup>th</sup> day of July, A. D., 2005.

Betty Ch...  
Justice Court Clerk

## STATE OF MISSISSIPPI, NOXUBEE COUNTY

BEFORE ME, Patty Che Justice Court Clerk of  
Noxubee County, Chris D. [unclear] Terry H. [unclear] makes affidavit

that Kerissa Shawn [unclear] on or about the 15 day of July

2005, in the county aforesaid did willfully and unlawfully while driving a motor vehicle,  
fail to stop the vehicle in compliance with a visible (or  
audible) signal given by a law enforcement officer acting  
in the lawful performance of duty and who had a reasonable  
suspicion to believe that the driver had committed a  
crime. The signal to stop was given by emergency  
light (or by siren or by voice or other hand.

Failure To Stop Motor Vehicle When Officer Signals  
97-9-72 (A)

against the peace and dignity of the State of Mississippi.

Sworn to and subscribed before me this 27th day of July, A. D. 2005

Patty Che  
Justice Court Clerk 05

STATE OF MISSISSIPPI, NOXUBEE COUNTY

BEFORE ME,

Ray  
Justice Court Clerk of

Noxubee County, Chief Deputy TERRY M. BRASSARD makes affidavit

that Rendrick Shawn Skutchica on or about the 15th day of July

2005 in the county aforesaid did willfully and unlawfully While driving a motor vehicle  
fail to drive his motor vehicle on the right half of  
the roadway on Washington St.

Right Half Driving On Roadway 63-3-601)

against the peace and dignity of the State of Mississippi.

Sworn to and subscribed before me this 21st day of July, A. D., 2005.

Terry M. Brassard  
Justice Court Clerk

STATE OF MISSISSIPPI, NOXUBEE COUNTY

BEFORE ME,

Brent C. Che Justice Court Clerk of

Noxubee County,

Chief Deputy Terry M. Lasswell

makes affidavit

that Kendrick S. Jaster on or about the 13th day of July

2005, in the county aforesaid did willfully and unlawfully drive a motor vehicle

in such a manner as to indicate a wanton disregard

for the safety of persons or property on or about

magnolia drive and Washington St by driving on both

sides of the streets, backing up in the street

Driving at a high rate of speed

Reckless Driving (145-3-1201)

against the peace and dignity of the State of Mississippi.

Sworn to and subscribed before me this

26th

day of

July

A. D., 2005.

Brent C. Che  
Justice Court Clerk